

**Statement of Basis
Major Modification
BFGoodrich
413-0024**

This proposed Title V Major Source Operating Permit modification is issued under the provisions of ADEM Admin. Code R. 335-3-16. The above named applicant has requested authorization to perform the work or operate the facility shown on the application and drawings, plans and other documents attached hereto or on file with the Air Division of the Alabama Department of Environmental Management, in accordance with the terms and conditions of this permit.

Modification Description

On May 31, 2018, BFGoodrich (BFG) submitted an application requesting the removal of the 444,444 lb/yr silane limit that is currently in the mixing provisos of the Major Source Operating Permit (MSOP). BFG has stated that the limit is redundant since a 38 tons per year (tpy) limit is also included in the permit. BFG requested this limit removal because operational data which was used to originally calculate the limit has changed since initial issuance.

Emissions

When the permit was issued in 2001, it was assumed that VOC emissions associated with the use of silane would primarily come from mixing operations, while a small portion would come from curing operations. Rubber Manufacturers Association emission factors were combined to form an overall emission factor for VOCs associated with the use of silane. The emission limit was included to avoid a PSD review. BFG has stated that operational changes at the plant have caused this assumption to become invalid. As a result, BFG cannot cure all rubber necessary because of the silane limit.

Recommendations

Given that the initial limit was imposed to avoid a PSD review, and given that the plant also has a 38 tpy VOC limit associated with the use of silane, I recommend that the 444,444 lb/yr limit of silane and all associated recordkeeping and reporting requirements should be removed to allow BFG the operational flexibility needed to meet current demands. This is a major modification and will require a public comment period.

Jacob Olinger
Energy Branch
Air Division

Date